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April 30, 2007

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commissions
445 – 12th Street, SW
Washington, DC 20554
Via ECFS

RE: Range Telephone Cooperative Inc.'s Petition for Waiver of the Commission's
Universal Service Rules, CC Docket No. 96-45

Dear Ms. Dortch

On March 28, 2007, Range Telephone Cooperative, Inc. ("Range") filed a petition for a one-time waiver of 47 CFR § 54.307(c) as applied to Range's fourth-quarter 2005 line counts. The attached affidavit supplements that petition.

As stated in the affidavit, USAC repeatedly assured Range that it had received all line count information necessary for Range to receive universal service funding as of its eligible telecommunications carrier effective date of March 21, 2006. It was only after Range failed to receive payments for the time period in question and after it again contacted USAC that USAC informed Range that USAC did not in fact have all of the necessary information. Range believes this mistake of fact and miscommunication is good cause to grant Range's waiver request.

As pointed-out in the Petition, Range believes special circumstances exist to grant its waiver request as Range is the **only** provider of broadband services within the Forsyth, Montana exchange. Granting Range's waiver request is in the public interest because Range's receipt of universal service funds for the time period in question will accelerate Range's deployment of broadband facilities to consumers in the Forsyth exchange.

Ms. Marlene H. Dortch
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Please contact me if you have any questions.

Sincerely,

CHRISTIAN, SAMSON, JONES
& CHISHOLM, PLLC

A handwritten signature in black ink, appearing to read "J. Williams", with a long horizontal flourish extending to the right.

Jason B. Williams

JBW/lf
Attachments

AFFIDAVIT OF ROBIN STEPHENS

State of Montana)
)
County of Rosebud)

I, Robin Stephens, being first duly sworn, depose and state as follows:

1. I have been Chief Financial Officer of Range Telephone Cooperative, Inc., (“Range”) since July 1st, 1999.

2. Range is a facilities-based telecommunications company that is both an incumbent local exchange carrier and a competitive local exchange carrier providing service in southeastern Montana and northeastern Wyoming.

3. In addition to my other duties as CFO, I ~~am~~ responsible for making all necessary filings with the Universal Service Administration Company (“USAC”) necessary for Range to receive federal universal service support.

4. On March 21, 2006, the Montana Public Service Commission (“Montana PSC”) designated Range as a competitive eligible telecommunications carrier for the Forsyth, Montana, local exchange. Range’s study area number is 489007.

5. To the best of my knowledge, I filed all line count data with USAC pursuant to Federal Communications Commission (“FCC”) d e s within 3 days of Range’s designation as an ETC.

6. Between about March 24th, 2006 and August 1st, 2006, I had multiple conversations and exchanged various emails with USAC staff whereby I inquired as to whether USAC had received copies of all line count data information necessary for Range to receive universal service support payments back to its CETC effective date of March 21, 2006.

7. On multiple occasions, various USAC staff told me that indeed USAC had received all line count data filings and all other information necessary for Range to receive universal service support back to its CETC effective date of March 21, 2006.

8. On November 3, 2006, I emailed UASC inquiring as to when and in what amounts Range could anticipate receiving future support payments from USAC.

9. On November 7, 2006, USAC responded to my November 3, 2006, email by stating that USAC did not have on file Range's fourth quarter 2005 line count data.

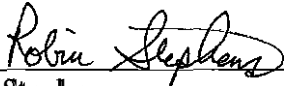
10. The November 7, 2006, email from USAC was contrary to previous conversations with USAC staff whereby USAC had informed me it had all information necessary for Range to receive universal service support as of its effective date of March 21, 2006.

11. The November 7, 2006, email from USAC was the first time I had any notice or knowledge that USAC did not have on file Range's fourth quarter 2005 line count data.

12. On November 9, 2006, I resubmitted line count data for fourth quarter 2005 as requested by USAC.

13. I have attached as "Exhibit A" to this affidavit copies of all relevant email exchanges between USAC personnel and myself involving this matter.

Dated this 26th day of April 2007.



Robin Stephens

STATE OF MONTANA)
) ss.
County of Rosebud)

On this 26th day of April 2007 before me, the undersigned, a Notary Public for the State of Montana, personally appeared Robin Stephens, known to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same.

IN WITNESS WHEREOF, I have hereunto set my hand and seal the day and year first above written.

(SEAL)



Print Name: BETTY M. HOWE
Notary Public for the State of Montana
Residing at: FORSYTH
My Commission Expires: 12-10-2009



EXHIBIT A

-----Original Message-----

From: HC FILINGS [mailto:HCFilings@hcli.universalservice.org]

Sent: Tuesday, November 07, 2006 6:54 AM

To: rob@rangetel.coop

Cc: HC FILINGS

Subject: RE: Payment received 10/31

Hello Robin,

The payment of \$68,973 was the total disbursements for the months of July, August and September, 2006, with the monthly amount of \$22,991, respectively.

You should get a monthly payment from now on, depending on your submission of the line counts by the filing dates. However, we have not received the line counts for lines as of 12/31/2005.

Please let us know, if you have any additional questions.

Regards,

Vijay K. Mathur
USAC
High Cost Division
444 Hoes Lane
Piscataway, NJ 08854
Tel: 877-877-4925
Fax: 866-873-4666

From: rob@rangetel.coop [mailto:rob@rangetel.coop]

Sent: Friday, November 03, 2006 11:52 AM

To: HC FILINGS

Cc: Curt (E-mail)

Subject: Payment received 10/31

Hello

We received a payment for USF dollars for our CLEC on Oct. 31, 2006 for \$68,793--thanks you-- but could you send me a breakdown of what months this paid and the dollars paid by month.

Do we get monthly payments from now on? I think we should

We are new at this and still have a few questions about it

Thanks for the help

Robin Stephens
Range Telephone Cooperative, Inc.
Study Area 489007
Forsyth, MT 59327
406-347-2226
fax 406-347-2410

-----Original Message-----

From: HC FILING5 [mailto:HCFilings@hcli.universalservice.org]

Sent: Monday, December 04, 2006 7:33 AM

To: Rob Stephens

Subject: RE: 525 filings for 12/31/2005

EMAIL RECEIPT CONFIRMATION!

From: Rob Stephens [mailto:rob@rangetel.coop]

Sent: Monday, December 04, 2006 9:09 AM

To: 'HCFilings@universalservice.org'

Subject: FW: 525 filings for 12/31/2005

Just to make sure you have these--Mr. Mathur said that you were missing these files which I have sent about 3 times.

Rob Stephens

-----Original Message-----

From: HC FILING5 [mailto:HCFilings@hcli.universalservice.org]

Sent: Thursday, November 09, 2006 2:50 PM

To: rob@rangetel.coop

Cc: HC FILING5

Subject: RE: 525 filings for 12/31/2005

Robin,

USAC is in receipt of your email and attachment however in reviewing the Form 525 we noticed that all the pages are blank. Please review and resubmit a completed Form 525.

Kind Regards,

Corina Graham
USAC High Cost Division
444 Hoes Lane
RRC 4A1060
Piscataway, NJ 08854
Tel: 877-877-4925
Fax: 866-873-4695

From: rob@rangetel.coop [mailto:rob@rangetel.coop]

Sent: Thursday, November 09, 2006 1:19 PM

To: HC FILINGS

Subject: 525 filings for 12/31/2005

I received an e mail today that said you had not received the information on the forms below as of 12/31/2005--I had sent them previously but here they are again--nothing has changed.

You should have all the info you need now. (again)

I got an e mail from Vijay K. Mathur saying these line counts were needed so please pass these on to him.

We received a payment of \$68,973 for July, August and September--for \$22,991 per month--could you send me a spreadsheet of how that is calculated?

Also, we are missing payments for March 23, 2006 to March 31, 2006, April, May and June--why haven't we received those payments yet?

Your help is appreciated.

You can call me at 800-927-2643 or e mail me with your response

Thanks

Robin Stephens

-----Original Message-----

From: HC FILINGS [mailto:HCFilings@hcli.universalservice.org]

Sent: Monday, December 04, 2006 8:58 AM

To: rob@rangetel.coop

Cc: HC FILINGS

Subjed: Range Telephone Cooperative, Inc. (MT 489007)

Hello Robin,

The September, 2006 disbursements for Range Telephone Cooperative, Inc. included the support for 3Q2006. The October, 2006 disbursements included support for 1Q2006 (\$20,472) and 2Q2006 (\$69,618). The carrier became eligible as of March 21, 2006.

Please let me know, if you need additional information

Regards,

Vijay K. Mathur

USAC

High Cost Division

444 hoes Lane

Piscataway, NJ 08854

Tel: 877-877-4925

Fax: 866-873-4666